

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
)	
GRIDDY ENERGY LLC, ¹)	Case No. 21-30923 (MI)
)	
Debtor.)	
)	

**CERTIFICATE OF NO OBJECTION TO DEBTOR’S EMERGENCY
MOTION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING
KEY EMPLOYEE RETENTION PLAN FOR NON-INSIDER EMPLOYEES**

1. On March 19, 2021, the debtor and debtor in possession in the above-captioned case (the “Debtor”) filed the *Debtor’s Emergency Motion for Entry of an Order Authorizing and Approving Key Employee Retention Plan for Non-Insider Employees* [Docket No. 59] (the “Motion”). A proposed order granting the relief requested in the Motion was attached as Exhibit A to the Motion (the “Original Proposed Order”).

2. On the same day, the Motion was served on (i) all parties registered to receive such service via the Court’s CM/ECF; and (ii) the parties listed in the Motion. *See* Certificate of Service [Docket No. 85].

3. Responses to the Motion were due April 9, 2021 at 5:00 p.m. (CDT) (the “Objection Deadline”). The Debtor agreed to extend the response deadline for the Official Committee of Unsecured Creditors (the “Committee”) until April 12, 2021 at 4:00 p.m. (CDT). A revised proposed order (the “Revised Proposed Order”) granting the relief requested in the Motion is attached hereto as Exhibit 1. Additionally, attached hereto as Exhibit 2 is a redline of the Revised

¹ The last four digits of its federal tax identification number of the Debtor are 1396. The mailing address for the Debtor is PO Box 1288, Greens Farms, CT 06838.

Proposed Order reflecting changes from the Original Proposed Order. The Revised Proposed Order corrects an inadvertent, non-substantive error in the Original Proposed Order.

4. In accordance with Paragraph 41 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than 24 hours have passed since the Objection Deadline, (ii) the undersigned counsel is unaware of any objections to entry to the Motion, and (iii) the undersigned counsel has reviewed the Court's docket and no objection or response to the Motion appears thereon.

5. Therefore, the Debtor respectfully requests entry of the Revised Proposed Order.

Dated: April 13, 2021
New York, New York

BAKER BOTTS L.L.P.

By: /s/ Robin Spigel
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Proposed Counsel to the Debtor and Debtor in Possession

Certificate of Service

I certify that on April 13, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Robin Spiegel